

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Allen E. Windrim          Debtor(s)  WILMINGTON TRUST NATIONAL ASSOCIATION NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE OF MFRA TRUST 2016-1 C/O MFRESIDENTIAL ASSETS I, LLC   Movant  v. Allen E. Windrim and Scott Waterman, Esquire  Respondents	18-16016 JKF  Chapter 13 Proceeding  Hearing Date: 02/06/2019 at 9:30am
--	---

**CERTIFICATE OF NO RESPONSE  
TO MOTION FOR RELIEF**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion filed on January 8, 2019 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than January 23, 2019.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Respectfully submitted,  
POWERS KIRN, LLC

By: /s/ Harry B. Reese, Esquire  
By: Harry B. Reese, Esquire  
Attorney ID # 310501  
Eight Neshaminy Interplex, Suite 215  
Trevose, PA 19053  
Telephone: 215-942-2090  
Facsimile: 215-942-8661  
E-mail: [harry.reese@powerskirn.com](mailto:harry.reese@powerskirn.com)  
Attorney for Movant  
DATED: January 25, 2019

15-1114

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Allen E. Windrim  <div style="text-align: right;">Debtor(s)</div> WILMINGTON TRUST NATIONAL ASSOCIATION NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE OF MFRA TRUST 2016-1 C/O MFRESIDENTIAL ASSETS I, LLC  <div style="text-align: right;">Movant</div> v. Allen E. Windrim and Scott Waterman, Esquire  <div style="text-align: right;">Respondents</div>	18-16016 JKF  Chapter 13 Proceeding  Hearing Date: 02/06/2019 at 9:30am
--	---

**CERTIFICATION OF SERVICE AND NOTICE**

Harry B. Reese, counsel for WILMINGTON TRUST NATIONAL ASSOCIATION NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE OF MFRA TRUST 2016-1 C/O MFRESIDENTIAL ASSETS I, LLC, hereby certifies that a copy of the foregoing Certificate of No Response was served upon the following persons by electronic notification or regular first-class mail, postage prepaid, on January 25, 2019:

**Served Electronically:**

Scott Waterman, Esquire  
2901 St. Lawrence Avenue, Suite 100  
Reading PA 19606  
Trustee

**Served Via 1st Class Mail:**

Allen E. Windrim, PRO SE  
2244 S. 9th Street  
Philadelphia PA 19148  
Debtor

POWERS KIRN, LLC

**By: /s/ Harry B. Reese, Esquire**  
By: Harry B. Reese, Esquire  
Attorney ID # 310501  
Eight Neshaminy Interplex, Suite 215  
Trevose, PA 19053  
Telephone: 215-942-2090  
Facsimile: 215-942-8661  
E-mail: [harry.reese@powerskirn.com](mailto:harry.reese@powerskirn.com)  
Attorney for Movant  
DATED: January 25, 2019